

BILL OF COMPLAINT

IN THE CIRCUIT COURT FOR FREDERICK COUNTY.

IN EQUITY.

Minnie E. Nichols

"

No.

13727

Equity.

vs.

"

"

"

Harry J. Nichols.

"

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The bill of complaint of Minnie E. Nichols of Woodsboro, Frederick County, Maryland, respectfully represents:

1. That until March 3, 1938, your complainant and the defendant, Harry J. Nichols, were husband and wife, residing at Woodsboro, Frederick County, Maryland.

2. That on said third day of March, 1938, your petitioner was divorced a vinculo matrimonii from the defendant as appears from a certified copy of the decree filed in No. 13570 Equity herewith and marked Exhibit "A."

3. That on the date of said decree for divorce, the said Minnie E. Nichols and Harry J. Nichols were the joint owners as tenants by the entireties of the following described real estate located near Woodsboro in said Frederick County, Maryland, to-wit:

(1) All that lot of land containing eighty (80) square perches, more or less, known as the school lot and being the same real estate described in a deed from the Frederick County Board of Education to the said Minnie E. Nichols and Harry J. Nichols, her husband, dated October 27, 1930, and recorded in Liber 378 at folio 15, one of the Land Records for said Frederick County, and a certified copy of said deed is filed herewith and marked Exhibit "B."

(2) All that lot of land containing two (2) acres, more or less, known as the Roberts property and being the same real estate described in the deed from Mary F. Roberts to the said Minnie E. Nichols and Harry J. Nichols, her husband, dated October 30, 1933, and recorded in Liber No. 388 at folio 594, one of the said Land Records, and a certified copy of said deed is filed herewith and marked Exhibit "C."